

1 ROBERT A. MUSIALA, JR. ESQ.  
 2 BAKER & HOSTETLER LLP  
 3 One North Wacker Drive  
 4 Suite 4500  
 5 Chicago, IL 60606  
 Telephone: 312.416.6200  
 Facsimile: 312.416.6201  
 Email: rmusiala@bakerlaw.com

6 *Regulatory Counsel for Debtor*

7  
 8 **UNITED STATES BANKRUPTCY COURT**  
 9

DISTRICT OF NEVADA

10 In re

Case No. BK-23-10423-mkn

11 CASH CLOUD, INC.,  
 12 dba COIN CLOUD,

Chapter 11

13 Debtor.

**BAKER & HOSTETLER'S MONTHLY  
 FEE STATEMENT OF SERVICES  
 RENDERED AND EXPENSES  
 INCURRED FOR THE PERIOD FROM  
 APRIL 4, 2023 THROUGH APRIL 30,  
 2023**

16 Hearing Date: N/A

17 Hearing Time: N/A

19 Baker & Hostetler ("B&H" or "Applicant"), regulatory counsel to Cash Cloud, Inc., dba Coin  
 20 Cloud ("Debtor"), debtor and debtor in possession in the above-referenced chapter 11 bankruptcy  
 21 case (the "Chapter 11 Case"), respectfully submits this Monthly Fee Statement for Services Rendered  
 22 and Expenses Incurred for the Period from April 4, 2023 through April 30, 2023 (the "Statement"),  
 23 pursuant to the *Order Authorizing Retention and Employment of Baker & Hostetler LLP as  
 24 Regulatory Counsel to Debtor* [ECF No. 525] (the "Retention Order") and the Court's *Order  
 25 Granting Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a) and 331, And Fed. R. Bankr. P. 2016,  
 26 Authorizing and Establishing Procedures for Interim Compensation and Reimbursement of Expenses  
 27 of Professionals* [ECF No. 321] (the "Interim Compensation Procedures Order").

1 In support of this Statement, B&H respectfully represents as follows:

2 1. B&H was retained as regulatory counsel to the Debtor pursuant to the Retention Order,  
3 dated and entered on May 5, 2023. On May 9, 2023, the Debtor paid B&H a retainer of \$50,000.00  
4 (the “Retainer”) as authorized in the Retention Order.

5 2. B&H has endeavored to monitor and coordinate with the Debtor’s counsel in this  
6 Chapter 11 Case to ensure a clear delineation of each firm’s respective roles in connection with the  
7 representation of the Debtor in this Chapter 11 Case and to prevent duplication of services. The  
8 professional services performed and expenses incurred by B&H were actual and necessary to  
9 preserve and protect the value of the Debtor’s assets and estate.

10 3. B&H hereby seeks allowance and payment of interim compensation for services  
11 rendered and reimbursement of expenses incurred as Debtor’s Court-authorized regulatory counsel  
12 during the period commencing April 4, 2023 and ending April 30, 2023 (the “Statement Period”).

13 4. B&H has not submitted any prior applications for compensation in connection with  
14 its representation of the Debtor.

15 5. B&H seeks allowance and payment of interim compensation for fees in the amount  
16 of \$9,300.80, representing 80% of the \$11,626.00 in fees incurred for services rendered during the  
17 Statement Period.

18 6. Attached hereto as Exhibit A is the name of each timekeeper who performed services  
19 in connection with the Chapter 11 Case and the regulatory matters during the Statement Period, and  
20 the hourly rate for each such timekeeper.

21 7. Attached hereto as Exhibit B is a detailed schedule of time expended by the  
22 timekeepers who performed services during the Statement Period and a detailed schedule of expenses  
23 paid during the Statement Period.

24 8. On the same date this Statement was filed, a copy of this Statement was served via  
25 electronic mail/notice on the following parties (each a “Notice Party,” and collectively the “Notice  
26 Parties”):

- 1 a. Cash Cloud, Inc., 10190 Covington Cross Drive, Las Vegas, Nevada 89144  
 (Attn: Christopher Andrew McAlary; chris@coincloud.com);
- 2 b. Fox Rothschild, LLP, 1980 Festival Plaza Drive, Suite 700, Las Vegas, NV  
 3 89135 (Attn: Brett A. Axelrod, Esq.; babelrod@foxrothschild.com);  
 4 counsel to Debtor;
- 5 c. United States Trustee Tracy Hope Davis, 300 Las Vegas Boulevard South,  
 6 Suite 4300, Las Vegas, NV 89101 (Attn: Jared A. Day, Trial Attorney;  
 Jared.A.Day@usdoj.gov);
- 7 d. Seward & Kissell, LLP, One Battery Park Plaza, New York, NY 10004  
 (Attn: Robert J. Gayda; gayda@sewkis.com; Catherine V. LoTempio;  
 8 lotempio@sewkis.com; Andrew J. Matott; matott@sewkis.com), and  
 9 Mcdonald Carano, LLP, 2300 West Sahara Avenue, Suite 1200, Las Vegas,  
 NV 89102 (Attn: Ryan J. Works; rworks@mcdonaldcarano.com), counsel  
 10 to the Official Committee of Unsecured Creditors;
- 11 e. Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL  
 12 33131 (Attn: Jordi Guso; JGuso@bergersingerman.com), and Sylvester &  
 Polednak, Ltd., 1731 Village Center Circle, Las Vegas, NV 89134 (Attn:  
 13 Jeffrey R. Sylvester; Jeff@SylvesterPolednak.com); counsel to DIP lender  
 CKDL Credit, LLC;
- 14 f. Morrison & Foerster LLP, 250 West 55th Street, New York, NY 10019-  
 15 9601 (Attn: Andrew Kissner; akissner@mofo.com; Gary Lee;  
 glee@mofo.com), and Shea Larsen, 1731 Village Center Circle, Suite 150,  
 16 Las Vegas, NV 89134 (Attn: James Patrick Shea; jshea@shea.law; Bart K.  
 Larsen; blarsen@shea.law; Kyle M. Wyant; kwyant@shea.law); counsel to  
 17 Enigma Securities Limited; and
- 18 g. Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, NY  
 19 10006, (Attn: Sean A. O'Neal; soneal@cgsh.com; Jane VanLare;  
 jvanlare@cgsh.com), and Snell & Wilmer L.L.P., 3883 Howard Hughes  
 Parkway, Suite 1100, Las Vegas, NV 89169 (Attn: Robert R. Kinias;  
 rkinas@swlaw.com); counsel to Genesis Global Holdco, LLC.

21       9. Pursuant to the Interim Compensation Procedures Order, each Notice Party will have  
 22 twenty (20) days after service (or the next business day if the 20th day is not a business day) of a  
 23 Monthly Fee Application (the "Objection Deadline"), to object to the requested fees and expenses in  
 24 accordance with the procedures described in subparagraph (b) set forth on page three of the Interim  
 25 Compensation Procedures Order.

1       10. If no objections are raised on or before the Objection Deadline, Applicant shall file a  
2 certificate of no objection with the Court, after which Debtor shall be authorized to pay to Applicant  
3 an amount equal to 80 percent of the fees and 100 percent of the expenses incurred during the period  
4 covered by Applicant's Monthly Fee Application (the "Aggregate Monthly Amount"). Applicant  
5 shall draw down on the Retainer in the Aggregate Monthly Amount.

6       11. If an objection is properly filed before the Objection Deadline, Applicant shall file a  
7 certificate of no objection with the Court with respect to the fees and expenses, if any, that are not  
8 subject to objection (the "Undisputed Fees" and "Undisputed Expenses"), after which Debtor shall  
9 be authorized to pay to Applicant an amount equal to 80 percent of the Undisputed Fees and 100  
10 percent of the Undisputed Expenses incurred during the period covered by Applicant's Monthly Fee  
11 Application (the "Aggregate Monthly Undisputed Amount"). Applicant shall draw down on the  
12 Retainer in the Aggregate Monthly Undisputed Amount.

13       12. Applicant acknowledges that the interim payment of compensation and  
14 reimbursement of expenses sought in this Statement does not constitute a request for final allowance  
15 of such compensation and reimbursement of expenses. At the conclusion of the Chapter 11 Case,  
16 Applicant will seek final allowance of the fees charged and expenses incurred for the entirety of the  
17 Chapter 11 Case, and any interim fees and expenses received during the course of the Chapter 11  
18 Case will be credited against such fees and expenses that are allowed on a final basis.

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13. Neither Applicant nor any member of B&H has any agreement or understanding of any kind to divide, pay over, or share with any other person, except as among the members of B&H, any portion of the fees or expenses to be awarded pursuant to this Statement.

Dated this 30th day of May 2023.

BAKER & HOSTETLER LLP

By: /s/Robert A. Musiala  
Robert A. Musiala  
One North Wacker Drive  
Suite 4500  
Chicago, IL 60606  
Telephone: 312.416.6200  
Facsimile: 312.416.6201  
Email: [rmusiala@bakerlaw.com](mailto:rmusiala@bakerlaw.com)

Michael A. Sabella  
45 Rockefeller Plaza  
New York, NY 10111  
(212) 589-4200  
[msabella@bakerlaw.com](mailto:msabella@bakerlaw.com)

*Regulatory Counsel for Debtor*

Respectfully submitted by:

**FOX ROTHSCHILD LLP**

By: /s/*Brett A. Axelrod*

BRETT A. AXELROD, ESQ.  
Nevada Bar No. 5859  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
*Counsel for Debtor*

## **EXHIBIT A**

## **Summary of B&H Professionals and Paraprofessionals**

**April 4, 2023 through April 30, 2023**

<b>Attorney</b>	<b>Hourly Rate</b>	<b>Application Hours</b>	<b>Total Fees</b>
Terry M. Brennan – Partner	\$950.00	.3	\$285.00
Elyssa S. Kates – Counsel	\$1,090.00	1.80	\$1,962.00
Robert A. Musiala – Partner	\$900.00	3.20	\$2,880.00
Michael A. Sabella – Counsel	\$970.00	6.70	\$6,499.00
<b>Subtotal</b>		12.00	\$11,626.00

FOX ROTHSCHILD LLP  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
(702) 597-6899  
(702) 597-5503 (fax)

## **EXHIBIT B**

## **Detailed Schedule of Time Expended by Professionals and Paraprofessionals**

FOX ROTHSCHILD LLP  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
(702) 262-6899  
(702) 597-5503 (fax)

# BakerHostetler

Cash Cloud Inc.  
D/B/A Coin Cloud  
10190 Covington Cross Dr  
Las Vegas, NV 89144

Invoice Date: 05/18/23  
Invoice Number: 51148561  
B&H File Number: 12918/128018/000001  
Taxpayer ID Number: 34-0082025  
Page 1

Regarding: **Regulatory Compliance Services**

For professional services rendered through April 30, 2023

**BALANCE FOR THIS INVOICE DUE BY 06/17/23 \$ 11,626.00**  
All amounts are in United States Dollars

## Remittance Copy

Please include this page with payment

**Invoice No: 51148561**

### Firm Contact Information

Katie Young  
(312) 416-6226  
[kyoung@bakerlaw.com](mailto:kyoung@bakerlaw.com)

**Please Remit To:**  
Baker & Hostetler LLP  
P.O. Box 70189  
Cleveland, OH 44190-0189

**Reference Invoice No:**  
**51148561**

**FOR WIRE REMITTANCES:**  
Baker & Hostetler LLP  
KeyBank, N.A., Cleveland, OH  
Account No: [REDACTED]  
SWIFT Code: [REDACTED]

Email the "Remittance Copy" to  
[bakerlockbox@bakerlaw.com](mailto:bakerlockbox@bakerlaw.com)

# BakerHostetler

Cash Cloud Inc.  
D/B/A Coin Cloud  
10190 Covington Cross Dr  
Las Vegas, NV 89144

Invoice Date: 05/18/23  
Invoice Number: 51148561  
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Page 2

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Regarding: **Regulatory Compliance Services**

For professional services rendered through April 30, 2023

<b>Fees</b>	\$	<b>11,626.00</b>
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<b>BALANCE FOR THIS INVOICE DUE BY 06/17/23 IN USD</b>	\$	<b>11,626.00</b>
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**Baker & Hostetler LLP**

*Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Dallas Denver Houston*  
*Los Angeles New York Orlando Philadelphia San Francisco Seattle Washington, DC Wilmington*

**Regarding:** **Regulatory Compliance Services**

Matter Number: 128018.000001

Name	Hours	Rate	Amount
Brennan, Terry M.	0.30	\$ 950.00	\$ 285.00
Musiala, Robert A.	3.20	900.00	2,880.00
Kates, Elyssa S.	1.80	1,090.00	1,962.00
Sabella, Michael A.	6.70	970.00	6,499.00
<b>Total</b>	<b>12.00</b>		<b>\$ 11,626.00</b>

Date	Name	Description	Hours	Amount
04/04/23	Brennan, Terry M.	Attend to Ohio license issues.	0.30	285.00
04/19/23	Sabella, Michael A.	Work on revisions and edits to draft application for retention, verified statement, and proposed order in connection with firm retention.	2.80	2,716.00
04/19/23	Sabella, Michael A.	Correspondence with Debtor's counsel regarding draft paperwork in connection with retention and questions and issues relating to same.	0.20	194.00
04/20/23	Sabella, Michael A.	Phone call with counsel for Debtors regarding retention in bankruptcy case and application in connection with same.	0.20	194.00
04/20/23	Sabella, Michael A.	Work on edits and revisions to verified statement, application, and conflicts disclosure in connection with retention.	2.20	2,134.00
04/21/23	Kates, Elyssa S.	Preparation of retention application and verified statement of Mr. Musiala.	1.10	1,199.00
04/21/23	Kates, Elyssa S.	Correspondence with Mr. Majkut regarding conflicts issues.	0.10	109.00
04/21/23	Kates, Elyssa S.	Call with Mr. Majkut and Mr. Marraro regarding potential conflicts issues with	0.30	327.00

**Baker & Hostetler LLP**

Date	Name	Description	Hours	Amount
		Baker & Hostetler LLP's retention in the case.		
04/21/23	Kates, Elyssa S.	Correspondence with Mr. Musiala regarding the retention application.	0.20	218.00
04/21/23	Kates, Elyssa S.	Correspondence with Mr. Musiala, Ms. Chlum, Ms. Noll, Ms. Axlerod and Mr. Sabella regarding Baker & Hostetler LLP's retention application.	0.10	109.00
04/24/23	Sabella, Michael A.	Work on finalizing papers in connection with retention and correspondence with Mr. Musiala and Debtors' counsel regarding same.	0.40	388.00
04/26/23	Musiala, Robert A.	Discuss regulatory issues with C McAlary and B Axelrod, review related documentation.	0.90	810.00
04/26/23	Sabella, Michael A.	Review Court order scheduling hearing on application to employ, and correspondence with Mr. Musiala regarding same.	0.10	97.00
04/26/23	Sabella, Michael A.	Correspondence with Mr. Musiala and Ms. Kates regarding issues relating to retention and regulatory matters for Debtor.	0.50	485.00
04/26/23	Sabella, Michael A.	Correspondence with Mr. Musiala regarding issues relating to retention and regulatory matters in connection with Debtor.	0.30	291.00
04/27/23	Musiala, Robert A.	Review documentation and internal notes related to FL OFR suspension order, draft and send email regarding same to B Axelrod, C McAlary.	0.50	450.00
04/27/23	Musiala, Robert A.	Draft and send email to FL OFR regarding suspension order and request to schedule meeting.	0.40	360.00
04/27/23	Musiala, Robert A.	Draft potential conflict waiver email for Coin Cloud and RockItCoin.	0.50	450.00
04/28/23	Musiala, Robert A.	Review FL OFR documentation, discuss with C McAlary and B Axelrod.	0.90	810.00

**Baker&Hostetler LLP**

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Dallas Denver Houston  
 Los Angeles New York Orlando Philadelphia San Francisco Seattle Washington, DC Wilmington

Date	Name	Description	Hours	Amount
	Total		12.00	11,626.00

Baker & Hostetler LLP

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Dallas Denver Houston  
Los Angeles New York Orlando Philadelphia San Francisco Seattle Washington, DC Wilmington